

MARKS, O'NEILL, O'BRIEN, DOHERTY & KELLY, P.C.

Sean X. Kelly

Melissa J. Brown

Sean Robins

Cherry Tree Corporate Center

Suite 501

535 Route 38 East

Cherry Hill, New Jersey 08002

Tel: (856) 663-4300

WILFORD CONRAD LLP

David A. Wilford

Christopher T. Conrad

Sabina B. Danek

18 East Dundee Road

Building 6, Suite 150

Barrington, Illinois 60010

Tel: (224) 848-4723

Attorneys for Defendants Liberty International Underwriters, a division of Liberty Mutual Insurance Company, Liberty Mutual Insurance Company, Royal & Sun Alliance Insurance Company of Canada, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078613, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078913, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB146013, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500612, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500642, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500626, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500618, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500629, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500630, Certain Underwriters at Lloyd's, London subscribing to Policy No. 15G142820113, and Chubb Insurance Company of Canada

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC.; VALEANT
PHARMACEUTICALS INTERNATIONAL; and
AGMS, INC.,

Plaintiffs,

v.

AIG INSURANCE COMPANY OF CANADA;

Civil Action No.: 3:18-cv-00493

Hon. Michael Shipp

**CERTIFICATION OF DAVID
A. WILFORD, ESQUIRE IN
SUPPORT OF APPLICATION**

ACE INA INSURANCE COMPANY; ALLIANZ
GLOBAL RISKS US INSURANCE COMPANY;
ARCH INSURANCE CANADA LTD; EVEREST
INSURANCE COMPANY OF CANADA;
HARTFORD FIRE INSURANCE COMPANY;
IRONSHORE CANADA LTD.; LIBERTY
INTERNATONAL UNDERWRITERS, a division
of LIBERTY MUTUAL INSURANCE
COMPANY; LIBERTY MUTUAL
INSURANCE COMPANY; LLOYD'S
UNDERWRITERS; LLOYD'S CONSORTIUM
9885 (a/k/a STARR FINANCIAL LINES
CONSORTIUM 9885); LLOYD'S SYNDICATE
ANV 1861; LLOYD'S SYNDICATE AMA 1200;
LLOYD'S SYNDICATE ARGO 1200; LLOYD'S
SYNDICATE AWH 2232; LLOYD'S
SYNDICATE BRT 2987; LLOYD'S SYNDICATE
CVS 1919; LLOYD'S SYNDICATE HCC 4141;
LLOYD'S SYNDICATE MITSUI 3210;
LLOYD'S SYDNICATE MIT 3210; LLOYD'S
SYNDICATE NAV 1221; LLOYD'S
SYNDICATE QBE 1886; LLOYD'S
SYNDICATE SJC 2003; ROYAL & SUN
ALLIANCE INSURANCE COMPANY OF
CANADA; TEMPLE INSURANCE COMPANY;
and XL INSURANCE COMPANY SE,

Defendants.

**FOR *PRO HAC VICE*
ADMISSION**

I, David A. Wilford, of full age, hereby certify as follows:

1. I am a partner in the law firm of Wilford Conrad LLP, located at 18 East Dundee Road, Building 6, Suite 150, Barrington, Illinois 60010. I respectfully submit this Certification in support of my application to appear as counsel *pro hac vice* for Defendants, Liberty International Underwriters, a division of Liberty Mutual Insurance Company, Liberty Mutual Insurance Company, Royal & Sun Alliance Insurance Company of Canada, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078613, incorrectly named as "Lloyd's Syndicate CVS 1919," Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078913, incorrectly

named as “Lloyd’s Syndicate QBE 1886” and “Lloyd’s Syndicate ANV 1861,” Certain Underwriters at Lloyd’s, London subscribing to Policy No. QB146013, incorrectly named as “Lloyd’s Syndicate Mitsui 3210,” Certain Underwriters at Lloyd’s, London subscribing to Policy No. B0509FINMW1500612, incorrectly named as “Lloyd’s Consortium 9885 (a/k/a Starr Financial Lines Consortium 9885)” and “Lloyd’s Syndicate QBE 1886,” Certain Underwriters at Lloyd’s, London subscribing to Policy No. B0509FINMW1500642, incorrectly named as “Lloyd’s Syndicate Argo 1200,” Certain Underwriters at Lloyd’s, London subscribing to Policy No. B0509FINMW1500626, incorrectly named as “Lloyd’s Syndicate MIT 3210,” Certain Underwriters at Lloyd’s, London subscribing to Policy No. B0509FINMW1500618, incorrectly named as “Lloyd’s Syndicate QBE 1886,” “Lloyd’s Syndicate ANV 1861” and “Lloyd’s Syndicate NAV 1221,” Certain Underwriters at Lloyd’s, London subscribing to Policy No. B0509FINMW1500629, incorrectly named as “Lloyd’s Syndicate MIT 3210” and “Lloyd’s Syndicate AMA 1200,” Certain Underwriters at Lloyd’s, London subscribing to Policy No. B0509FINMW1500630, incorrectly named as “Lloyd’s Syndicate BRT 2987” and “Lloyd’s Syndicate NAV 1221,” Certain Underwriters at Lloyd’s, London subscribing to Policy No. 15G142820113, incorrectly named as “Lloyd’s Syndicate HCC 4141,” and Chubb Insurance Company of Canada, formerly known as ACE INA Insurance Company (collectively, the “Represented Defendants”), in the above-captioned litigation. I am personally familiar with the facts set forth in this Certification.

2. I am a member in good standing of the Bar of the State of Illinois.

3. I am admitted for the practice of law in the following jurisdictions: U.S. District Court for the Northern District of Illinois, U.S. District Court for the Central District of Illinois, and U.S. District Court for the Southern District of Illinois.

4. No disciplinary proceedings are pending against me, and no discipline has previously been imposed on me in any jurisdiction. I understand my continuing obligation to advise the Court of any disciplinary proceeding that may be instituted against me.

5. My law firm has been retained as co-counsel for the Represented Defendants in this litigation. The issues raised in this litigation involve areas with which I have experience in the law.

6. Pursuant to Local Civil Rule 101.1(c), the law firm of Marks, O'Neill, O'Brien, Doherty & Kelly, P.C., attorneys of record for the Represented Defendants in this litigation, will continue to serve as counsel of record in this matter; will review and sign all pleadings, briefs, and other papers filed with the Court on behalf of the Represented Defendants, and will be present for all appearances before the Court unless previously excused from appearing by the Court.

7. I agree to strictly observe the dates fixed for scheduling conferences, motions, briefs, pre-trial conferences, trial or other proceedings, to submit to the jurisdiction of this Court for the purposes of sanctions, discipline, or other such action as the Court may deem proper, and to otherwise abide by all the terms and conditions of Local Civil Rule 101.1(c). I agree to be bound by the rules governing practice in the New Jersey Courts, including the disciplinary rules.

8. Pursuant to Local Civil Rule 101.1(c)(2), I agree to pay the annual fee required by the New Jersey Lawyers' Fund for Client Protection, as provided by New Jersey Court Rule 1:28-2(a) and as directed by the Trustees of the Fund. I further agree that, pursuant to Local Civil Rule 101.1(c)(3), I shall pay \$150 to the Clerk of the United States District Court for the District of New Jersey.

9. For the foregoing reasons, I respectfully request on behalf of the Represented Defendants that I be admitted *pro hac vice* for the purpose of representing the Represented Defendants in this litigation, in association with Marks, O'Neill, O'Brien, Doherty & Kelly, P.C.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: January 30, 2018

By: s/ David A. Wilford

David A. Wilford (*pro hac vice* pending)

WILFORD CONRAD LLP

Attorney for Defendants Liberty International Underwriters, a division of Liberty Mutual Insurance Company, Liberty Mutual Insurance Company, Royal & Sun Alliance Insurance Company of Canada, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078613, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078913, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB146013, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500612, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500642, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500626, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500618, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500629, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500630, Certain Underwriters at Lloyd's, London subscribing to Policy No. 15G142820113, and Chubb Insurance Company of Canada